

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAVID E. KAPLAN, et al., :
Plaintiffs, : No. 12 Civ. 9350 (VM) (KNF)
- against - : **ECF CASE**
S.A.C. CAPITAL ADVISORS, L.P., et al., :
Defendants. :
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**DECLARATION OF ETHAN D. WOHL IN RESPONSE TO
DEFENDANTS' OBJECTIONS TO MAGISTRATE JUDGE FOX'S
JULY 19, 2013 ORDER MODIFYING THE PSLRA DISCOVERY
STAY AND REQUEST FOR A STAY OF THAT ORDER**

ETHAN D. WOHL, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the law firm of Wohl & Fruchter LLP and a member of the Bar of this Court and submit this declaration in response to Defendants' Objections to Magistrate Judge Fox's July 19, 2013 Order modifying the PSLRA discovery stay (the "Discovery Order"), and request for a stay of the Discovery Order.

2. The exhibits attached hereto are lettered consecutively with the exhibits in the motion papers submitted to Judge Fox.

3. Attached hereto as Exhibit G is a true and correct copy of the Discovery Order.

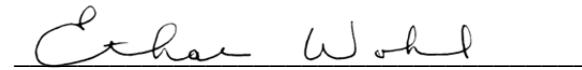
4. Attached hereto as Exhibit H is a true and correct copy of the parties' Stipulation and [Proposed] Order Concerning Production of Documents, dated August 2, 2013.

5. Attached hereto as Exhibit I is a true and correct copy of email correspondence between counsel on July 30.

6. Attached hereto as Exhibit J is a true and correct copy of a redline of the draft protective order proposed by the SAC Defendants against the precedent form they obtained from an earlier litigation, forwarded by counsel for the SAC Defendants on August 2, 2013.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York
August 6, 2013


Ethan D. Wohl